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TRANSMITTAL LETTER AND U S NAVY RESPONSES TO U S EPA REGION I COMMENTS
ON FINAL STUDY AREA AND SCREENING EVALUATION FOR TANK FARM 3 SITE 11 NS
NEWPORT RI
10/7/2013
TETRA TECH



C-NAVY-10-13-5279W

October 7, 2013

Project Number 112G02710

Ms. Kimberlee Keckler, Remedial Project Manager
U.S. EPA Region I
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order No. WE59

Subject: Transmittal of Response to EPA Comments,
Final Study Area and Screening Evaluation (SASE) Tank Farm 3
Site 11: Tank Farm 3, NAVSTA Newport, Rhode Island

Dear Ms. Keckler:

On behalf of Mr. Roberto Pagtalunan, U.S. Navy NAVFAC, Tetra Tech is providing to you the Navy's response to EPAs comments and an errata sheet for the Final SASE for the site referenced above. Comments were received from the USEPA dated September 4, 2013.

Please incorporate the errata sheet into the Final SASE, following the acronyms. If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Dabra I. Seiken'.

Dabra I. Seiken, CG
Project Manager

DIS/lh

Encl.

cc: R. Pagtalunan, NAVFAC (w/encl.)
P. Crump, RIDEM (w/encl.)
D. Moore, NAVSTA (w/encl.)
G. Glenn, Tetra Tech (w/o encl.)
NIRIS – RDM File (w/encl - 1)
File G02710-3.2 (w/o encl.) File G02710-8.0 (w/encl.)

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**NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS (DATED SEPTEMBER 9, 2013) REGARDING
THE FINAL STUDY AREA SCREENING EVALUATION (SASE) FOR TANK FARM 3
NAVAL STATION NEWPORT, RHODE ISLAND**

On September 4, 2013, Navy received comments on the Final SASE, Tank Farm 3, Naval Station Newport, Rhode Island. These comments are presented below (in regular font), followed by Navy's responses (in **bold**).

EPA General Comments

EPA reviewed the *Study Area Screening Evaluation for Tank Farm 3* dated August 2013 (SASE). The SASE reports whether contaminants are present at concentrations exceeding the CERCLA risk-based screening standards to determine whether further investigations are necessary.

GC#1) Please explain why AOC 20, the former electrical transformer block house, has not been investigated further for PCBs and metals. The TPH screening and confirmatory laboratory analyses conducted do not constitute an adequate investigation of AOC 20. Either include AOC 20 with the Category 3 sites and sample soil for PCBs and metals, or investigate it concomitant with the two outdoor transformers.

Navy Response: The area has not been investigated for metals because there is no evidence of the use/ storage or release of metals in the area.

During the Environmental Site Investigation one surface soil sample (0 to 2-feet bgs) was collected and analyzed for PCBs using EPA Method 8080. The sample was collected from the soil boring for well GZ-314, at AOC-20. The analytical results indicated that none of the individual Aroclors were in the sample above their quantitation limits of 5 ug/kg. Subsequently, during the SASE the decision was made that the only portion of AOC-20 that required additional sampling and analysis for PCBs were around the existing pad-mounted transformers.

If the team agrees, it is possible to re-allocate some of the PCB sample locations designated in the Final SAP around the pad-mounted transformers further west and north to sample some of the other portions of AOC-20 for PCBs. Since this is still part of AOC-20, if the team decides to do this, it would be done as a field modification during the implementation of the Final SAP.

GC#2) Figure 1-2 appears to indicate that Outfall #5, where the discharge from the burn pit and oil-water separator #3 enters Lawton Brook, has not been investigated because sample SW-3 was collected upstream of the dam separating SW-3 from Outfall #5. Is this correct? It appears that sediment at the outfall has not been sampled (only surface water sampling was conducted in 1995). Add Outfall #5 to the list of Category 3 sites with sampling of sediment and surface water for PAHs, metals, and dioxins.

Navy Response: Please recall that treated ring drain water at the Site is discharged via outfall 005 which is operated under the RIPDES permit RI0020150, and regulated under the RIDEMs Office of Water Resources.

The investigation at AOC-001 is for CERCLA contaminants associated with burning. Review of records indicates that when the sand pit was used for burning the old outfall was at Lawton Reservoir and not near outfall 005. This is why sediment sample SD-06 was placed upstream of outfall 005.

Please see the agreement made regarding sediment sampling in this area in Navy's January 13, 2011 and April 28, 2011 responses to EPAs comments on the Draft SASE. You will notice that at that time, the Navy agreed to sample sediment downgradient of the old outfall from the burn pit.

EPA SPECIFIC COMMENTS

Table 2-1 Please list Building 228 and oil-water separator #3. Both were investigated in 2004 according pages 2-8 and 2-9.

Navy Response: See the errata sheet (attached) that adds the Building 228 and OWS#3 information to Table 2-1.

Table 4-5, p. 9 Please correct the last entry. Building 228 is a valve house, not the electrical control house.

Add the Lawton Brook surface water sampling.

Navy Response: See the errata sheet (attached) that corrects the Building 228 entry and adds the Lawton Brook surface water sampling in Table 4-5.

Errata Sheet for:

Study Area Screening Evaluation for Tank Farm 3,
NAVSTA, Newport, Rhode Island, July 2013.

Prepared for: Naval Facilities Engineering Command Mid-Atlantic

Prepared by: Tetra Tech

Prepared Under: Contract Number N62470-08-D-1001,
“CLEAN” Contract Task Order No. WE59

Errata: Table 2-1. The following rows should be added to this table.

AOC	Description	Summary of Investigation / Remedial Action	Required Remediation in 2004 Y/N	Suggested Investigation Post –SASE	Suggested CAP/LUC Post-SASE
B-228	Former Valve House	Soil was excavated to expose the piping coming in and out of building. The pipe bedding was sampled.	N	N	N
OWS #3	Oil Water Separator that treats BSW from tanks.	Test pit excavations around the secondary containment and collection of a wall scrape sample inside the containment.	N	N	N

Errata: Table 4-5, page 9 of 9. The AOC entered in the last row of Table 4-5 should be called Valve House (Building 228) instead of Electrical Control House (Building 228).

Errata: Table 4-5, page 9 of 9. The following information of previous surface water sampling and analysis performed at Tank Farm 3 should be added.

Areas/AOC	Sample Type	Sample Location	Sample ID
Lawton Brook	Surface Water	SW-1	SW-1
		SW-2	SW-2
		SW-3	SW-3